

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**ERICSSON INC. AND
TELEFONAKTIEBOLAGET LM ERICSSON,**

Plaintiff,

vs.

**SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
AND SAMSUNG RESEARCH AMERICA,**

Defendants.

Civil Action No. 2:20-cv-380-JRG

JURY TRIAL

MOTION TO FILE CERTAIN EXHIBITS UNDER SEAL

Plaintiff Ericsson Inc. (“Ericsson”) respectfully requests the Court’s leave to file under seal certain exhibits to their Emergency Application for Temporary Restraining Order and Anti-Interface Injunction Related to Samsung’s Lawsuit Filed in the Wuhan Intermediate People’s Court of China. Given that Samsung has not appeared in this case, a protective order has not been entered. However, once a protective order is entered, exhibits 3 and 4 to the Mathews Declaration filed with Ericsson’s Emergency Application contain proprietary and “HIGHLY CONFIDENTIAL” information that would be produced by Ericsson under an “ATTORNEYS’ EYES ONLY” designation. Given the contents of the documents that are the subject of this motion, Ericsson respectfully requests that the Court grant its motion to seal.

Dated: December 28, 2020.

McKool Smith, P.C.

/s/ Theodore Stevenson, III

Theodore Stevenson, III
Texas State Bar No. 19196650
tstevenson@mckoolsmith.com

Nicholas Mathews
Texas State Bar No. 24085457
nmathews@McKoolSmith.com

Erik B. Fountain
Texas State Bar No. 24097701
efountain@McKoolSmith.com

McKool Smith, P.C.

300 Crescent Court Suite 1500
Dallas, TX 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

Christine Woodin
Texas State Bar No. 24199951
California Bar No. 295023
cwoodin@mckoolsmith.com
MCKOOL SMITH, P.C.
300 South Grand Avenue, Suite 2900
Los Angeles, California 90071
Telephone: (213) 694-1200
Telecopier: (213) 694-1234

Blake Bailey
Texas State Bar No. 24069329
bbailey@mckoolsmith.com
MCKOOL SMITH, P.C.
600 Travis Street, Suite 7000
Houston, TX 77002
Telephone: (713) 485-7300
Telecopier: (713) 485-7344

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@McKoolSmith.com
Jennifer L. Truelove
Texas State Bar No. 24012906
jtruelove@McKoolSmith.com
McKool Smith, P.C.
300 Crescent Court, Suite 1500

Dallas, TX 75201
Telephone: (903) 923-9001

**ATTORNEYS FOR PLAINTIFFS
ERICSSON INC. AND
TELEFONAKTIEBOLAGET LM
ERICSSON**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on December 28, 2020.

/s/ Nicholas Mathews
Nicholas Mathews